

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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MARY ANDRUS; ELEANOR ARCHAMBEAU; DIANE  
BONNEAU; LERTIS CALDWELL; PRISCILLA COTE;  
THERESA DEJOY; LAURAL FANKHAUSER; NANCY  
KENNEDY; BARBARA WILLIAMS; LUCINDA  
YOUELL,

PLAINTIFFS,

v.

INDEVUS PHARMACEUTICALS, INC., F/K/A  
INTERNEURON PHARMACEUTICALS, INC.; WYETH,  
INC; F/K/A AMERICAN HOME PRODUCTS  
CORPORATION; WYETH PHARMACEUTICALS, INC  
F/K/A WYETH-AYERST PHARMACEUTICALS, INC.;  
A DIVISION OF AMERICAN HOME PRODUCTS  
CORPORATION; AND BOEHRINGER INGELHEIM  
PHARMACEUTICALS, INC.,

DEFENDANTS.

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CIVIL ACTION  
NO. 04-10911 GAO

**WYETH'S ASSENTED TO MOTION FOR LEAVE TO FILE  
A MEMORANDUM IN EXCESS OF TWENTY PAGES IN  
OPPOSITION TO PLAINTIFFS' MOTION FOR REMAND**

Defendant Wyeth<sup>1</sup> requests leave to file an memorandum in excess of twenty (20) pages in opposition to Plaintiffs' Motion for Remand. It is necessary to exceed the 20-page limit to present the relevant facts and legal arguments in a coherent manner and to ensure that the Court adequately understands the issues raised by plaintiffs' motion and Wyeth's opposition thereto. Plaintiffs have assented to this motion.

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<sup>1</sup> Sued herein as Wyeth, Inc. f/k/a American Home Products Corporation and Wyeth Pharmaceuticals, Inc. f/k/a Wyeth-Ayerst Pharmaceuticals, Inc. a Division of American Home Products Corporation.

WHEREFORE, Wyeth, with the assent of plaintiffs, respectfully requests that the Court allow it leave to file the accompanying memorandum exceeding 20 pages, in opposition to Plaintiffs' Motion for Remand.

/s/ Janice W. Howe  
William A. McCormack, BBO # 329580  
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Bingham McCutchen LLP  
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(617) 951-8000

Dated: June 21, 2004

**CERTIFICATE OF CONFERENCE UNDER LOCAL RULE 7(A)(2)**

On June 21, 2004 Janice W. Howe, Esq., counsel for Wyeth, conferred with Edward J. Barshak, Esq., counsel for plaintiffs, regarding this motion. Mr. Barshak assented to Wyeth's Motion for Leave to File a Memorandum in Excess of Twenty Pages in Opposition to Plaintiffs' Motion for Remand.

/s/ Janice W. Howe  
Janice W. Howe  
*Counsel for Defendants Wyeth  
and Wyeth Pharmaceuticals, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2004, a true copy of the above document was served upon the following counsel by hand and by United States First Class Mail, postage prepaid:

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/s/ Janice W. Howe

Janice W. Howe  
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and Wyeth Pharmaceuticals, Inc.*